

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Dr. Kathleen Sutcliffe.
3. Attached hereto as Exhibit 1 is a true and correct copy of Katie M. O'Brien, et al., *Intimate Care Products and Incidence of Hormone-Related Cancers: A Quantitative Bias Analysis*, Journal of Clinical Oncology (2024).
4. Attached hereto as Exhibit 2 is a true and correct copy of the

NIH/NIEHS Environmental Factor, *Genital Talc Use May Be Linked To Increase Risk Of Ovarian Cancer—New Study By NIEHS Scientists Provides Compelling Evidence That Genital Talc Use Is Associated With And Increased Risk Of Ovarian Cancer* (June 2024).

5. Attached hereto as Exhibit 3 is a true and correct copy of Harris, et al., *Epidemiologic Methods to Advance Our Understanding of Ovarian Cancer Risk*, J. Clin. Oncol 001:-3 (May 15, 2024).

6. Attached hereto as Exhibit 4 is a true and correct copy of an Invoice (#72) prepared by Dr. John Kornak for King & Spalding, LLP, dated June 1, 2024.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Expert Report of John Kornak, Ph.D., dated May 28, 2024.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Deposition of John Kornak, Ph.D., dated July 8, 2024.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Rebuttal Expert Report of Elizabeth A. Stuart, Ph.D., dated July 21, 2024.

10. Attached hereto as Exhibit 8 is a true and correct copy of the NIH Intramural Research Program's Biography Webpage for Dale Sandler, Ph.D.

11. Attached hereto as Exhibit 9 is a true and correct copy of the NIH Intramural Research Program's Biography Webpage for Clarice Weinberg,

Ph.D.

12. Attached hereto as Exhibit 10 is a true and correct copy of the NIEHS, Research Articles (list of Sister Study publications), available at <https://sisterstudy.niehs.nih.gov/English/articles.htm>

13. Attached hereto as Exhibit 11 is a true and correct copy of Gonzales, et al., *Douching, Talc and Risk Of Ovarian Cancer*, 27 Epidemiology 797 (2016).

14. Attached hereto as Exhibit 12 is a true and correct copy of Katie O'Brien, et al., The Association between Douching, Genital Talc Use, and the Risk of Prevalent and Incident Cervical Cancer, 11 Nature 14836 (2021)

15. Attached hereto as Exhibit 13 is a true and correct copy of the Sister Study Health, Medical History and Lifestyle Questionnaire Version 2A.

16. Attached hereto as Exhibit 14 is a true and correct copy of Ian R. White and Patrick Royston, *Imputing Missing Covariate Values for the Cox Model*, 28 Statistics Med. 1982 (2009).

17. Attached hereto as Exhibit 15 is a true and correct copy of the ASCO Press Release, Study Finds Association Between Genital Talc Use and Increased Risk of Ovarian Cancer (May 15, 2024).

18. Attached hereto as Exhibit 16 is a true and correct copy of the Crossmark publication history of O'Brien (2024).

19. Attached hereto as Exhibit 17 is a true and correct copy of the Peng Li, et al., *Multiple Imputation: A Flexible Tool for Handling Missing Data*, 314 JAMA 1966 (2015).

20. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/ Michelle A. Parfitt
Michelle A. Parfitt